



#1 of #2

Motion to Amend Complaint

In the United States District Court For The
Eastern District of Virginia
Alexandria Division

Thomas Cieniewicz Plaintiff

v.

Ghafourpour DDS
et al

Case No. 1:22-cv-00172-LMB-TGB

Plaintiff requests that Sheriff Jim O'Sullivan be added as a Defendant.

Sheriff Jim O'Sullivan failed to maintain proper oversight on Wellpath Medical Services therefore allowing negligent Medical Care to be administered to the Plaintiff violating his Eighth Amendment Rights.

Dr. Ghafourpour DDS actually saw the Plaintiff twice once in May/June and refused to replace filling and again in September? for an annual checkup and Plaintiff begged him to extract the tooth.

Dr. Taylor saw the ~~defendant~~ Plaintiff on several occasions for unrelated issues and stated that he was already prescribed Tylenol and Naproxen so no other pain relief necessary. Not recognizing the prolonged ingestion of Naproxen.

Plaintiff has found it impossible to be seen by Dr. Taylor for the G.I. pain he suffers from as well as any other unrelated matter since this complaint has been filed. Has copies of Numerous requests to be seen and for copies of Medical Records.

Plaintiff personally witnessed Nurse Williams place him on the Doctors "to see" list as well as two other nurses do the same only to have her name mysteriously removed. When confronted the Nurses stated that they ~~were~~ had been instructed to not give any information to the Plaintiff.

Plaintiff attempted to file grievances and voiced his need for Medical Attention to several Deputies, Sergeants, Medical Staff to no avail. Plaintiff was transferred to a DOC facility after serving 32 months and only 49 day remaining even though he was told that he would serve all his time in Chesapeake by DOC.

Chesapeake City Jail as well as Well Path Medical are doing every thing within their power to hinder the Plaintiff from obtaining valuable information.

Sheriff Jim O'Sullivan has failed to protect the Plaintiff of his Eighth Amendment rights.

These acts represent a pattern of events demonstrating intentional retaliation against the Plaintiff.

Respectfully Submitted

Theresa McCrory